

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CRIMINAL NO. 20-cr-30094-SMY
	)	
NICHOLAS WRIGHT,	)	
	)	
Defendant.	)	

**STIPULATION OF FACTS**

The United States and the Defendant agree and stipulate as follows:

1. On or about June 27, 2020, Defendant, in Madison County, Illinois, within the Southern District of Illinois, and elsewhere, did travel in interstate commerce for the purpose of engaging in any illicit sexual conduct with another person.
2. On approximately June 27, 2020, an FBI Online Covert Employee (“OCE”) was in a St. Louis group chat in a mobile messaging application.
3. While on his cellphone, Defendant initiated a conversation with the OCE, whose profile displayed the name “Bailey Hammer”. Defendant believed “Bailey Hammer” to be a fifteen (15) year old minor.
4. During the conversation, Defendant requested “Bailey Hammer” engage in sexual activity in exchange for \$25.00.
5. The conversation continued regarding planning a meet up time and location. A meeting was tentatively set after 2:45 PM at a FBI undercover house in Collinsville, Illinois. Defendant agreed to meet “Bailey Hammer” on June 27, 2020 at the “Bailey Hammer’s” residence for a sexual encounter.

6. Defendant drove to the undercover house and law enforcement agents subsequently took Defendant into custody.

7. During a search incident to arrest, agents located \$30.00 in United States Currency on his person.

8. Defendant admitted that he was the one who had been chatting with "Bailey Hammer", and he was aware that she was a minor.


9. Defendant further admitted that he drove from the southern suburb of St. Louis, Missouri to Collinsville, Illinois to meet with "Bailey Hammer" for a sexual encounter. Defendant stated that he brought the money to pay "Bailey Hammer" for sex. Specifically, he planned to pay "Bailey Hammer" \$30.00 for oral sex.

10. Defendant stipulates that the facts set forth above prove beyond a reasonable doubt the conduct charged in Count 3 of the Indictment.

SO STIPULATED.

UNITED STATES OF AMERICA,

STEVEN D. WEINHOFER  
United States Attorney

  
\_\_\_\_\_  
Nicholas Wright  
Defendant

  
\_\_\_\_\_  
Karelia S. Rajagopal  
Assistant United States Attorney

  
\_\_\_\_\_  
Joseph W. Flees  
Attorney for Defendant

Date: November 4, 2021

Date: November 5, 2021